



# Executive summary

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“I cannot afford for [the] TTC to take my money and not provide me the 100 rides they owe me. I was not asking for a handout.”

— Rider who had approximately \$300 in discontinued fares saved

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## Executive summary

In late October 2024, the Toronto Transit Commission (TTC) announced that it would stop accepting tokens and tickets at the end of that year. It also said there would be no refunds, credits or exchanges for the discontinued fares (the refund decision). Within days, riders contacted our office with concerns about the TTC's decision. In December 2024, the TTC Board of Commissioners voted to allow riders additional time, extending the deadline for using the discontinued fares to June 2025 (and December 2025 for Wheel-Trans riders using the Wheel-Trans system). Even with the extension, we heard from complainants, some of whom had saved hundreds of dollars' worth of the discontinued fares and were unable to use them before the deadline.

We contacted the TTC to get more information about the refund decision. In our initial inquiries, staff were unable to explain who made the decision or how it was reached. I then began an investigation into how the TTC arrived at the refund decision and whether the decision-making process was fair. I did not look at the fairness of the TTC's decision to discontinue these fares, or its decision not to provide refunds or exchanges.

Our investigation could not determine who made the refund decision, when the decision was made or how it was reached. Some board members and staff pointed to the board, while others believed it was staff. The TTC could not produce records to support either account. Board members and staff were also at odds about who should have made the refund decision in the first place.

A TTC executive told the board in October 2024 that there were approximately 6.7 million tokens and 573,000 tickets still in circulation, with an estimated value of \$24 million. The TTC acknowledged this wouldn't be the total amount of the refunds, as many of these fares had been lost, damaged or added to personal collections. During interviews, board members and staff also stated that there were logistical and financial challenges to authenticating fares and implementing a refund or exchange program for discontinued tickets and tokens.

We recognize that the TTC has significant fiscal pressures. However, while these challenges are understandable, the TTC failed to take steps to understand the impacts on riders. We found no evidence it collected data, consulted with the public or conducted an equity impact analysis.

More broadly, this investigation showed the TTC lacks a consistent process or practice for making certain fare-related decisions. It also revealed larger concerns about the



fairness of the TTC's decision-making and record-keeping. Although our investigation focused on a single issue, one executive told us that they could “swap this [refund] issue out and give you ten others and you'd be asking me the exact same questions today.”

I made eight recommendations to the TTC to strengthen its decision-making and improve transparency to the public.

## What we did

On Aug. 6, 2025, I launched this investigation into how the TTC made the refund decision. The investigation focused on:

- the TTC's process leading to the refund decision, including how the TTC assessed the refund decision against relevant policies and equity considerations
- how the TTC communicated and engaged with the public, both on the refund decision and on the requests for refunds from individual riders

My office interviewed 37 people, including TTC board members, current and former TTC staff, City staff, advocates, researchers and riders who complained to our office. We also reviewed hundreds of internal and public TTC documents.

## What we found

- No one we spoke with, from TTC staff to board members, could agree who made the refund decision. The TTC did not follow a transparent process, as it did not consider the decision publicly and it failed to produce any record of the refund decision.
- Neither staff nor the board could clearly set out the criteria for when this type of refund decision and certain fare decisions should be made by the board and when they should be made by staff, with the exception of fare increases which are set by the board. The TTC does not define system-wide fare change decisions, however this can include refund decisions, adding or discontinuing fare types and changing the conditions of use for fares. The TTC does not have a documented process to guide these types of fare decisions.
- The TTC failed to gather any data or consult with the public to give them an opportunity to share their thoughts on the impact of the refund decision. This would have gone part way towards promoting more informed decision-making.



- The TTC did not conduct any equity impact analysis to understand and mitigate the impact of the refund decision on riders. Some staff demonstrated a lack of understanding and empathy towards riders who had accumulated large amounts of discontinued fares.
- The TTC did not consistently communicate with the public that there would be no refunds or exchanges for discontinued fares, even though some riders and staff believed that tokens did not expire. In fall 2019, the TTC put out communications that included a brief mention that it would be discontinuing tickets and tokens and would not offer refunds. The TTC said nothing more on the issue of refunds until late 2024.
- The TTC denied all requests for refunds for discontinued fares, including for riders who said that they had exceptional circumstances.
- The TTC justified its decision not to provide refunds by referring some riders to a fare policy document that does not exist. A refund policy that some staff relied on was outdated and unknown to some staff who were involved in considering refund requests.
- Staff never submitted some reports that the TTC board requested. Notably, in April 2019 the board requested that staff report on the impact of refunding tokens. Staff never completed the report and no one could explain why.

## Recommendations

I made eight recommendations to strengthen how the TTC handles its decision-making about fares, process for equity analyses, tracking of board requests to staff, development of public-facing rider policies and process for approving and updating policy documents.

The TTC board and staff accepted all eight of my recommendations.

## Conclusion

The TTC provides an essential service and operates one of the largest transit systems in North America. For many riders, it is their only way to travel across the city for work, leisure and to access essential services.

This investigation began with a simple question about how the refund decision was made. However, TTC board members and staff shared conflicting information on who made this decision, and no one could provide a record documenting it. These gaps point to broader concerns about transparency and accountability within the organization.



Without stronger processes and criteria to guide these types of fare decisions and to enhance transparency and accountability, the TTC risks losing public confidence in the fairness of its decisions.

Although, some staff expressed a commitment to equity, the TTC made the refund decision without collecting data, consulting the public, or assessing or understanding the potential impact on riders, including equity-deserving groups.

Public institutions must be able to explain how decisions are made, who made them and how it considered the communities that were affected.

Although this investigation focused on the process leading to the refund decision, it uncovered broader systemic issues at the TTC. Once implemented, my recommendations will strengthen decision-making at the TTC and ensure it is serving the public in a fair, transparent and accountable way.